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Report to Chairman, Civil Service Commission; by H. L. Krieger,  
Director, Federal Personnel and Compensation Div.

Issue Area: Personnel Management and Compensation: Training and  
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Organization Concerned: General Services Administration;  
Department of Agriculture; Department of the Interior;  
Department of the Army; Department of the Air Force;  
Department of the Navy.

Authority: Equal Employment Opportunity Act of 1972. 5 U.S.C.  
41. OMB Circular A-11.

A review of the Upward Mobility program in six  
Departments and agencies was made to see how much progress has  
been made in implementing these programs. Policies, guidance,  
procedures, and program evaluation were examined.  
Findings/Conclusions: Since 1974, the Civil Service Commission  
has taken many actions to improve program efforts throughout the  
Federal Government. However, GAO believes additional  
improvements can be made by giving departments and agencies  
detailed guidance on conducting the analyses needed to justify  
training agreements and on improving the accuracy and  
completeness of reported Upward Mobility program costs through  
various controls. Adoption of these suggestions would strengthen  
the Federal Government's Upward Mobility efforts. (DJM)

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UNITED STATES GENERAL ACCOUNTING OFFICE

WASHINGTON, D.C. 20548

FEDERAL PERSONNEL AND  
COMPENSATION DIVISION

MAR 28 1977

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Chairman  
U.S. Civil Service Commission

Dear Mr. Chairman:

We recently completed a review of the Upward Mobility programs in the General Services Administration and the Departments of Agriculture, the Army, Air Force, Navy, and Interior to see how much progress has been made in implementing these programs. We reviewed Upward Mobility program efforts at the departmental and agency levels and at 33 field installations throughout the United States. We also examined Upward Mobility policies, guidance, and procedures as well as program evaluation procedures.

We reviewed these programs in 1973 and 1974 and issued a report to the Congress in April 1975 entitled "Upward Mobility Programs in the Federal Government Should Be Made More Effective" (FPCD-75-84). That review covered 19 Federal departments and agencies, including the 6 covered in this review.

Since 1974, the Civil Service Commission (CSC) has taken many actions to improve Upward Mobility program efforts throughout the Federal Government. A variety of policy statements, guidelines, and other information has been developed and published by CSC in an attempt to improve such areas as Upward Mobility planning, training in support of Upward Mobility, the use of job restructuring in providing Upward Mobility, and program evaluation criteria. In addition, various handbooks have been published.

Although positive actions have been taken, we believe additional improvements can be made by

--giving departments and agencies detailed guidance on conducting the analyses needed to justify training agreements and

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--improving the accuracy and completeness of reported Upward Mobility program costs through various controls.

Both improvements are discussed in detail in separate enclosures to this letter. In our opinion, adoption of these suggestions, which CSC officials generally agreed with, would strengthen the Federal Government's Upward Mobility efforts.

We would appreciate being advised of any actions planned or taken with respect to our suggestions. In addition, as you know, section 236 of the Legislative Reorganization Act of 1970 requires the head of a Federal agency to submit a written response on actions taken on our recommendations to the House Committee on Government Operations and the Senate Committee on Governmental Affairs not later than 60 days after the date of the report and the House and Senate Committees on Appropriations with the agency's first request for appropriations made more than 60 days after the date of the report.

Copies of this letter are being sent to the Senate Committee on Labor and Public Welfare, the House Committee on Education and Labor, and its Subcommittee on Equal Opportunities.

We appreciate the cooperation and courtesy of CSC officials during our visit.

Sincerely yours,



H.L. Krieger  
Director

Enclosures - 2

NEED TO STRENGTHEN REVIEW PROCEDURES  
OVER APPROVAL OF TRAINING AGREEMENTS

CSC is responsible for providing program leadership and technical assistance to Federal departments and agencies on their Upward Mobility programs. Upward Mobility programs are designed to develop employees' skills and potential so they can qualify for target positions in career fields offering advancement. CSC has been promoting, through its technical assistance activities, job restructuring and training agreements as management tools to help provide additional Upward Mobility opportunities to lower level employees.

An Upward Mobility training agreement is a vehicle that waives minimum experience and education requirements for a particular position and substitutes intensive, accelerated training for part of the position qualification standards. Since it is, in essence, a modification of the qualification standards, CSC is responsible for reviewing and approving it before trainees enter a training program. Agencies and departments wanting to continue their training agreements must reapply for and receive CSC approval at least every 2 years.

CSC procedures require that agency training agreements include a justification for the agreement; a list of specific entry and target occupations by title, grade, and occupational series; a description of the factors for selecting participants; and a description of the training to be received. It is necessary, therefore, that agencies and departments plan their training programs properly.

Proper Upward Mobility program planning includes the following elements:

- Systematically identifying the extent of Upward Mobility problems through use of various occupational analyses.
- Identifying manpower needs.
- Establishing target jobs.
- Assessing the present skills of the work force.
- Designing valid selection systems in accordance with merit procedures.

- Designing training programs in accordance with CSC regulations and chapter 41, title 5, U.S.C.

CSC does not require evaluations on how effectively training agreements achieve Upward Mobility when agencies resubmit their training agreements for approval. It does not require agencies to submit, with their proposed training agreements, documentation insuring that the necessary program planning was done before developing and submitting the training agreement for CSC approval. Cognizant CSC officials informed us that they assume that agencies and departments have done the necessary program planning before requesting approval of an agreement. They were unaware of any Upward Mobility training agreement implementation problems at the departments and agencies we visited. However, they stated that any such problems an agency had would, if brought to their attention, affect renewal of the training agreement.

We reviewed the program planning of four departments; it was nonexistent. All four had submitted a training agreement, including justification statements and target occupations, but:

- None had determined its Upward Mobility needs by systematically identifying and analyzing job patterns inhibiting Upward Mobility before defining its target population. Such analyses are necessary because Upward Mobility needs differ among agencies and departments, and Upward Mobility programs should be directed to those needs.
- None had made a staffpower analysis before establishing target occupations in the training agreements.
- Two departments were providing formal training in non-Government facilities under their training agreements although neither had conducted employee skills surveys to see if qualified employees were already available for promotion. These departments may, therefore, be violating chapter 41, title 5, U.S.C.

Some departments have had problems implementing their training agreements. For example, several field activities in one department prohibited qualified employees from competing for target jobs even though the department's Upward Mobility training agreement required that they be considered.

In another department, the training agreement required that the job element approach be applied to each position. Nevertheless, only one agency had made a job element analysis to measure candidate potential prior to selection. The other agencies within this department merely interviewed personnel. In addition, this same department required that participants selected under the training agreement be evaluated quarterly in writing. Of the 50 participants' files reviewed, 38 had at least 1 evaluation missing and 14 had as many as 5 evaluations missing.

Despite these implementation problems, three of the four departments had submitted at least one training agreement for renewal without evaluating the effectiveness of their prior training agreements.

### CONCLUSIONS AND RECOMMENDATIONS

Not all Federal departments and agencies have conducted necessary program planning before submitting Upward Mobility training agreements for CSC approval. Consequently, CSC has received too little information to decide whether or not to approve Upward Mobility training agreements.

Hence, for CSC to better carry out its leadership and technical assistance responsibilities regarding Upward Mobility training agreements, we recommend that its Chairman direct appropriate officials to provide departments and agencies with guidance

- detailing how to conduct staffpower analyses and skills surveys in support of initial and subsequent Upward Mobility training agreements and
- identifying the information needed to evaluate the effectiveness of their Upward Mobility training agreements. Such information should include the number of vacancies filled through the training agreement by occupational series and grade levels and a delineation of problems on participant selection or evaluation.

We also recommend that the Chairman insure that CSC's annual on-site personnel management and EEO evaluations include an analysis of the results of agencies' Upward Mobility and training agreement implementations.

NEED TO STRENGTHEN COST REPORTINGPROCEDURES FOR UPWARD MOBILITY

In December 1971 CSC was designated the administrative agency responsible for collecting and providing the Office of Management and Budget (OMB) with Federal-wide equal employment opportunity data for annual presentation in a special analysis to be included in the U.S. budget. Also, the Equal Employment Opportunity (EEO) Act of 1972 requires Federal agencies to submit annual Affirmative Action Plans (AAPs) to CSC for review and approval. To meet these responsibilities, CSC requires agency EEO officers to provide, in both the AAP and OMB Circular A-11 submissions, annual cost data on their internal EEO program activities, including Upward Mobility. Agencies must prepare a narrative statement including comments on data reliability, explanation of data sources and estimating procedures, and actions planned to improve data collection. Upward Mobility obligations and outlays also must be reported. In addition, CSC must check the accuracy of costs submitted under OMB Circular A-11.

Not all departments and agencies are reporting Upward Mobility data collection and reliability problems. Analysis of the Upward Mobility costs reported in the OMB A-11 submissions from five departments and agencies revealed the following:

--In one department, data from 25 field activities showed that

- (1) only two activities included all the required Upward Mobility cost elements,
- (2) seven activities did not include administrative costs associated with Upward Mobility, and
- (3) twenty-two activities did not include on-the-job training costs as part of their Upward Mobility costs.

--In another department, data from two field activities showed that

- (1) one activity included costs for a cooperative education program which, according to CSC guidance, are not to be included and

- (2) the other activity reported only administrative support costs for its Upward Mobility program. Training costs were not included.

Although program officials in various departments and agencies stated that they know that reported OMB A-11 information is unreliable, only one department addressed Upward Mobility data reliability problems in its A-11 submission to CSC.

Moreover, CSC does not try to insure that reported data is reliable. According to a CSC program official, the submitting agencies are responsible for addressing such problems. Unless problems are identified in the submissions, CSC assumes that data is reliable. Although we recommended to the departments and agencies included in this review that they notify CSC of Upward Mobility cost reliability and collection problems, CSC is ultimately responsible for such accuracy.

#### CONCLUSIONS AND RECOMMENDATIONS

Federal agencies have submitted unreliable Upward Mobility costs. We recommend, therefore, that the Chairman, CSC, direct appropriate program officials to

- study problems in reporting Upward Mobility costs under OMB Circular A-11,
- inform OMB of problems in reporting Upward Mobility costs under OMB Circular A-11, and
- develop controls to insure that reported Upward Mobility program costs are accurate and complete.